

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2020-125-E**

Application of Dominion Energy South	)	<b><u>UNITED STATES DEPARTMENT</u></b>
Carolina, Inc. for Adjustment of	)	<b><u>OF DEFENSE AND ALL OTHER</u></b>
Rates and Charges (See Commission	)	<b><u>FEDERAL EXECUTIVE</u></b>
Order No. 2020-13)	)	<b><u>AGENCIES' SEVENTH SET OF</u></b>
	)	<b><u>WRITTEN INTERROGATORIES</u></b>
	)	<b><u>AND REQUEST FOR</u></b>
	)	<b><u>PRODUCTION OF DOCUMENTS</u></b>
	)	<b><u>AND THINGS TO DOMINION</u></b>
	)	<b><u>ENERGY SOUTH CAROLINA, INC.</u></b>

Pursuant to the Public Service Commission's Regulation 103-833, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby submits its Seventh Set of Written Interrogatories and Request for Production of Documents and Things to Dominion Energy South Carolina, Inc.

**INSTRUCTIONS**

1. Responses to these request should be provided within 20 days of this request in writing and under oath.
2. These Requests are continuing in nature and require supplemental answers within a reasonable time if additional documents or information would be responsive to these Requests.

3. If any of the responses do not contain complete information, so state this and identify each person who may have the additional information.

4. Due to mandated teleworking due to COVID-19, please deliver responses electronically to [emilcy.w.medlyn.civ@mail.mil](mailto:emilcy.w.medlyn.civ@mail.mil).

### **DEFINITIONS**

1. “Company” is defined as Dominion Energy South Carolina, Inc.

2. “DESC” is defined as Dominion Energy South Carolina, Inc.

3. “DESS” is defined as Dominion Energy Southeast Services, Inc.

4. “DE” is defined as Dominion Energy

5. “Document” and “workpaper” shall have the broadest possible meaning and include, without limitation, the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any

of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

6. “Identify” or “identity,” when referring to a natural person, shall mean to provide without limitation his or her full name, present or last-known address, telephone number, present or last-known business affiliation and location, and job titles and responsibilities during the applicable time covered by any response referring to such person.

7. “Identify” or “identity,” when referring to a document or writing, shall mean to give sufficient characterization of the document or writing so as to have identified it with reasonable particularity and shall include, without limitation, the following information with respect to such document or writing:

- a. The author and the sender of the document or writing;
- b. The date appearing on the document or writing, and if it has no date, the answer shall so state but shall give the date or approximate date the document or writing was prepared;
- c. The general nature or description of the document;
- d. The name of the person or persons, if any, to whom such document or writing was addressed and the names of other persons to whom the document or copies thereof were given or sent, if any;
- e. The name and address of the person having present possession, custody, or control of the document or writing.

## **DOCUMENT AND INFORMATION REQUESTS**

**DOD/FEA-DESC No. 7-1.** Please provide the cost of service study results with an allocation of Production and Transmission plant and associated costs based on a CP demand allocation using the instantaneous demand (no more than a 15-minute average demand interval) instead of the four-hour average demand. In other words, please provide the cost of service study class allocations that result from using an instantaneous peak rather than a 4-hour average peak.

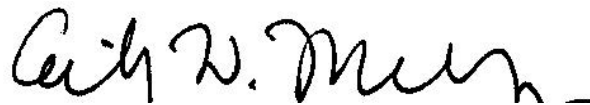
**DOD/FEA-DESC No. 7-2.** Please provide the balance of Property-Related Unprotected EDIT at January 1, 2018, January 1, 2020 and the estimated balance at January 1, 2021.

**DOD/FEA-DESC No. 7-3.** Please provide the data and/or analysis justifying the bulk allocation of plant to the Large industrial rate class for those plant accounts where a direct assignment of facilities has been made. In particular, please explain how the Company ensures that an over-assignment of costs does not occur for those customers with a direct assignment of plant.

**DOD/FEA-DESC No. 7-4.** Please provide the data and/or analysis justifying the direct assignment of facilities to the Large industrial rate class.

**DOD/FEA-DESC No. 7-5.** Previous requests for information asked for workpapers related to the development of the cost of service study allocation factors. The Company referenced its response to ORS 2-40 in responding to our question. ORS 2-40 provides a listing of the allocation factors and the resulting percentages by class but provides no underlying load data. Please provide the underlying data, which includes the load data by rate class, that supports the development of the allocation factors.

Respectfully submitted,



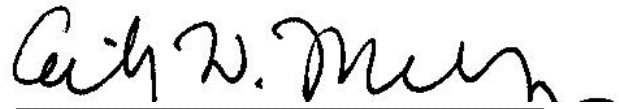

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November 2, 2020

**CERTIFICATE OF SERVICE**

I, Emily W. Medlyn, hereby certify that the foregoing document was served on all persons at the addresses listed in the Official Service List for Docket 2020-125-E on November 2, 2020.

A handwritten signature in black ink, appearing to read "Emily W. Medlyn", written over a horizontal line.

Emily W. Medlyn